

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)
MDL No. 2323

THIS DOCUMENT RELATES TO:

**Plaintiffs' Master Administrative Long
Form Complaint and:**

BEN UTECHT, Only
v. National Football League, et al.,
No. 12-cv-4180-AB (E.D.P.A.)

**DECLARATION OF
SCOTT D. HILLSTROM**

Pursuant to 28 U.S.C. § 1746, Scott D. Hillstrom declares as follows:

1. I am licensed to practice law in the State of Minnesota and before the Minnesota federal district court.
2. Ben Utecht has retained me as his personal business lawyer.
3. I do not have experience in either personal injury or class action litigation and, therefore, have declined to represent Mr. Utecht in the NFL concussion litigation (case no 12-md-2323 (AB)) presently pending before this Court. I will not accept representation of Mr. Utecht in place of Sol Weiss and Anapol Schwartz.
4. I have, nonetheless, appeared in the NFL concussion litigation (case no. 12-md-2323 (AB)) for the limited purpose of posing objections to the proposed settlement agreement based upon contract interpretation issues, an area of the law in which I do have

experience. Mr. Weiss does not agree with the objections and, thus, could not file them himself on Mr. Utecht's behalf.

5. Furthermore, I did not represent Mr. Utecht in his grievance arbitration with the NFL.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2014



Scott D. Hillstrom